

# **EXHIBIT C**

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**From:** Sarah Jones <sjones@ericdeters.com>  
**Sent:** Friday, October 15, 2021 10:04 AM  
**To:** Posey, William A.  
**Cc:** Glenn Feagan  
**Subject:** Harsman, et al v. Cincinnati Children's, et al  
**Attachments:** Ltr to Hon. William Posey 10.15.21.pdf

Per Mr. Glenn Feagan, please see attached. Thank you.

Sarah York



Independence Office  
5247 Madison Pike  
Independence, KY 41051  
859.363.1900  
Fax: 859.363.1444

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**Reply To:**

October 15, 2021

Hon. William Posey  
[wposey@kmlaw.com](mailto:wposey@kmlaw.com)  
1 E 4th St #1400,  
Cincinnati, OH 45202

**RE: Harsman, et al v. Cincinnati Children's, et al**  
**Case No. 1:21-cv-597-TSB**

Mr. Posey:

We plan to continue litigating our claims and will appeal all rulings from Judge Black.

We are more than comfortable refuting your assertions and stand by our attempts on behalf of these healthcare workers.

Judge Black is not omnipotent, and our position is far from "conspiracy theories."

I want to address a few of your specific allegations:

1. Receiving over 20,000 emails from 5,000 healthcare workers is far from not doing a factual review.
2. Having several competent lawyers and clerks performing research and drafting our claims is far from not investigating.
3. Removing a case to federal court is forum shopping.
4. Winning or losing is not the standard. We are allowed to advance claims based upon facts, law and good faith modification of existing law. The issue of the hospitals being a quasi-state actor is one such issue. Whether *Jacobson* is still good law is another.
5. Other jurisdictions on the same facts and law have decided these issues differently.

Finally, if this was so baseless, why over \$160,000 in legal fees for only an initial skirmish? We look forward to scrutinizing your bills.

Sincerely,

A handwritten signature in black ink that reads "Glenn Feagan" followed by a stylized flourish or "sy" at the end.

Glenn Feagan